



November 24, 2014

VIA ECF

Hon. Joel A. Pisano, U.S.D.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**RE: *BRRAM, Inc., et al. v. FAA, et al.*,
Civil Action No. 3:14-cv-02686-JAP-DEA**

John E. Flaherty
Partner
T. 973-639-7903
F. 973-297-3971
jflaherty@mccarter.com

Dear Judge Pisano:

We, along with Hogan Lovells US LLP, represent Defendant Frontier Airlines, Inc. ("Frontier") in the above-referenced action. We write on behalf of defendants Frontier, Mercer County Board of Chosen Freeholders, and the United States Federal Aviation Administration (collectively, the "Defendants") to request an extension of time within which defendants may file (1) their opposition to Plaintiffs' motion to amend the complaint [D.E. 35] and (2) Defendants' reply brief in support of their Motions to Dismiss [D.E. 21, 23, 24].

Plaintiffs filed a motion to amend the complaint on November 20, 2014. The opposition to Plaintiffs' motion to amend the complaint is due December 1, 2014, and the reply brief in support of the Defendants' Motions to Dismiss is due December 5, 2014. Defendants respectfully request that both deadlines be extended to **December 15, 2014**.

Defendants seek an extension of time because both submissions are related and to address scheduling and workload issues. Plaintiffs do not object to this request so long as their reply brief for the motion to amend the complaint is due **January 5, 2014**. Defendants do not oppose this request.

Your Honor previously granted Defendants' request for an extension of time to file their reply brief in support of their Motions to Dismiss. [D.E. 29]. There have been no previous requests for an extension of the deadline to oppose Plaintiffs' motion to amend the complaint.

If this request meets with Your Honor's approval, we respectfully request that you 'so order' this letter and have it filed on the docket.

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD

WASHINGTON, DC

WILMINGTON

McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102-4056
T. 973.622.4444
F. 973.624.7070
www.mccarter.com

Hon. Joel A. Pisano, U.S.D.J.
November 24, 2014
Page 2

Respectfully,

s/ John E. Flaherty

John E. Flaherty

cc: Hon. Douglas E. Arpert, U.S.M.J.
Counsel of Record (via email)

SO ORDERED on this ____ day
of _____, 2014:

HON. JOEL A. PISANO
United States District Judge